



27th Floor  
1633 Broadway  
New York, NY 10019-6708

**Michael Goettig**  
212-603-6498 tel  
212-489-8340 fax

michaelgoettig@dwt.com

March 9, 2015

**VIA ECF AND FACSIMILE (212) 805-4268**

Hon. Gabriel W. Gorenstein  
United States District Court, Southern District of New York  
500 Pearl Street, Courtroom 6B  
New York, New York 10007-1312

Re: *Ojeda v. Viacom, Inc., et al*, No. 13-CV-5658

Your Honor:

This firm is counsel for Defendants in the above referenced action. On behalf of all parties, I write in reference to Docket Entry #93, which schedules a settlement conference before the Court on March 13, 2015. As set forth in the January 20, 2015 letter filed by counsel for Plaintiffs (Docket #92), the parties have agreed to the terms of a settlement in principle. Counsel for Plaintiffs have advised that they anticipate filing documents in support of their motion for preliminary approval of the terms of that settlement (the "Motion") by Wednesday, March 11. Defendants do not anticipate interposing an opposition to the Motion. Accordingly, on behalf of all parties, we respectfully request that the March 13 settlement conference be converted to an opportunity for the Court to address Plaintiff's anticipated motion.

We thank the Court in advance for its attention to this request.

Very truly yours,

Davis Wright Tremaine LLP

A handwritten signature in black ink, appearing to read 'Michael Goettig', written over a horizontal line.

Michael Goettig

DWT 26410167v1 0061172-000029

Anchorage  
Bellevue  
Los Angeles

New York  
Portland  
San Francisco

Seattle  
Shanghai  
Washington, D.C.

www.dwt.com